

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

IN RE:

JAMES M. PARTAIN and
CAROL PARTAIN,

CASE NO.: 6:19-bk-00878-CCJ
CHAPTER 13

Debtors. _____ /

MOTION FOR REFERRAL TO MORTGAGE MODIFICATION MEDIATION
RE: 3163 Hanging Moss Circle Kissimmee, FL 34741

The Debtors request entry of an order referring the Debtors and RUSHMORE LOAN MANAGEMENT SERVICES, LLC, regarding that certain loan ending in 3406, to mortgage modification mediation, and in support thereof state:

1. The Debtors filed this Chapter 13 case in an attempt to retain their primary residence.
2. The Debtors would like to modify the terms of the mortgages encumbering their primary residence, located at 3163 Hanging Moss Circle Kissimmee, FL 34741. The Debtors' income would allow them to contribute as much as 31% of their current net income to payment of their modified mortgage debt.
3. Mediation pursuant to Local Rule 9019-2 will assist the parties in negotiation of a modification of the relevant mortgages.
4. The Debtors will pay the \$250.00 mediation cost directly to the Mediator within seven (7) days of the designation of such Mediator.

Wherefore, the Debtors request the entry of an order referring this case to mediation and for such other and further relief as this Court deems just and proper.

DATED: 6/28/19

Respectfully Submitted,

/s/ CHARLES W. PRICE, ESQ.
CHARLES W. PRICE, Esq.
FL. Bar No. 870862
PRICE LAW FIRM
400 Maitland Avenue
Altamonte Springs, FL 32701
charlie@cpricelawfirm.com
P. 407.834.0090/ F. 407.386.7610

CERTIFICATE OF SERVICE

I hereby certify that this 28th day of June 2019, a true and correct copy of the Motion for Mediation of Debtors was furnished by U.S. mail, postage prepaid, to the following:

James and Carol Partain
3163 Hanging Moss Circle
Kissimmee, FL 34741

Rushmore Loan Management, LLC
15480 Laguna Canyon Road
Suite 100
Irvine, CA 92618

Rushmore Loan Management, LLC
Attn: Terry Smith, Member
15480 LAGUNA CANYON ROAD
SUITE 100
IRVINE, CA 92618

Rushmore Loan Management, LLC
C/O CORPORATION SERVICE COMPANY, Registered Agent
1201 HAYS STREET
TALLAHASSEE FL 32301-2525

Laurie Weatherford, Chapter 13 Trustee (electronic transmission)

/s/ CHARLES W. PRICE, ESQ.
CHARLES W. PRICE, Esq.
FL. Bar No. 870862
PRICE LAW FIRM
400 Maitland Avenue
Altamonte Springs, FL 32701
P. 407.834.0090/ F. 407.386.7610